

1 Christopher J. Cannon (No. 88034)
2 SUGARMAN & CANNON
3 737 Tehama Street, No. 3
4 San Francisco, CA. 94103
5 Telephone: (415) 362-6252
6 Facsimile: (415) 362-6431
7 E-mail: chris@sugarmancannon.com

8 Attorney for Defendant
9 DHIRENDRA PRASAD

10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE NORTHERN DISTRICT OF CALIFORNIA
12 SAN JOSE VENUE

13 UNITED STATES OF AMERICA,) Case No. 22-CR-00123-BLF
14 Plaintiff,)
15 v.) STIPULATION AND [proposed]
16) ORDER TO CONTINUE STATUS
17) HEARING
18 DHIRENDRA PRASAD,)
19 Defendant.)

20 Because the Parties are actively engaged in settlement negotiations that hopefully will lead
21 to the resolution of this case and the related forfeiture case, it is hereby stipulated by and between
22 counsel for the United States and counsel for the defendant DHIRENDRA PRASAD, that the status
23 hearing presently set for July 12, 2022, is continued until August 9, 2022.

24 The parties stipulate and agree that excluding time will allow for the effective preparation of
25 counsel, See 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that ends of
26 justice served by excluding the time from July 12, 2022,

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1 through August 9, 2022, from computation under the Speedy Trial Act outweighs the best interests
2 of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A),(B)(iv).

3 IT IS SO STIPULATED.

4 DATED: July 8, 2022

/s/

5 Michael Pitman
6 Assistant United States Attorney

7 DATED: July 8, 2022

/s/

8 Christopher J. Cannon
9 Attorney for Dhirendra Prasad

10 [PROPOSED] ORDER

11 Based upon the facts set forth in the stipulation of the parties and for good cause shown,
12 the status conference set in this matter for July 12, 2022, is continued to August 9, 2022. The
13 Court also finds that failing to exclude the time from July 12, 2022, through August 9, 2022,
14 would unreasonably deny defense counsel and the defendant the reasonable time necessary for
15 effective preparation, taking into account the exercise of due diligence. 18 U.S.C. §
16 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time
17 from July 12, 2022, through August 9, 2022, from computation under the Speedy Trial Act
18 outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and with
19 the consent of the parties, IT IS HEREBY ORDERED that the time from July 12, 2022, through
20 August 9, 2022, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. §
21 3161(h)(7)(A), (B)(iv).

22 IT IS SO ORDERED.

23 DATE:

24 _____
25 The Honorable Beth Labson Freeman
26 United States District Judge
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